

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**INQUIRY REGARDING CARRIER
CURRENT SYSTEMS, INCLUDING
BROADBAND OVER POWER LINE
SYSTEMS**

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ET Docket No. 03-104

To: The Commission

Of the thousands of Megahertz of radio spectrum available today, only approximately 30 MHz has the ability to support worldwide communications without requiring any man-made infrastructure. This 30 MHz is traditionally referred to as the High Frequency (HF) spectrum and falls between approximately 3 and 30 MHz. The ability of radio signals at these frequencies to reflect from the ionosphere makes this small portion of the spectrum a unique and valuable resource to nations worldwide. Because only 30 MHz of the entire electromagnetic spectrum exhibits this unique propagation property, it would seem prudent that the HF spectrum be protected from spectrum pollution by any technology, which does not use the spectrum for radio communications purposes.

BPL, a delivery system for broadband data, has the potential to radiate unwanted RF spectrum byproducts because RF energy is coupled onto the electrical power grid. The ubiquitous, highly distributed nature of this grid creates an antenna system of enormous proportion, which has the potential to radiate the coupled RF energy over a huge geographic area. If the coupled RF energy includes frequencies in the HF spectrum, the potential will exist to disrupt the worldwide radio communications that take place in this unique and extremely small portion of the electromagnetic spectrum.

To preserve this unique 30 MHz portion of the electromagnetic spectrum, it would seem prudent for the Commission to ensure that its emission guidelines are sufficiently strong to protect said spectrum from any degradation resulting from BPL or any other invention whose byproducts include spurious RF emissions, or to prohibit operation of any device whose spurious byproducts cannot be prevented from causing radio interference in said spectrum.

Respectfully submitted,

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